

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

BOKF NA, <i>et al.</i> ,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Case No. 3:18-CV-00794-N
	§	
VICKIE SUE WISE, <i>et al.</i> ,	§	
	§	
Defendants.	§	

UNOPPOSED
JOINT MOTION FOR PROTECTIVE ORDER
Standard Protective Order – Northern District of Texas

Plaintiff, BOKF NA, (“the Bank”) and Defendants Vickie Sue Wise (“Wise), Carroll “Skip” Davis, Melissa Morgeson Del-Cid, and Hilltop Securities, Inc. (Hilltop), hereinafter Defendants as “Hilltop”), jointly request the entry of a protective order named Standard Protective Order – Northern District of Texas.

Certificate of Conference Local Civil Rule 7.1

1. This motion is unopposed.
2. Counsel for the Bank met and conferred with counsel for the Defendants regarding a motion of for a protective order. Said conferences occurred on: April 12, 2018, June 18, 2018, January 25, 2019 and on January 29, 2019.

Grounds for Protective Order

As grounds for the Protective Order, Plaintiff and Defendant state as follows.

3. The Bank is a national banking association. The Bank desires to maintain the confidentiality of its client financial records and certain employee records.

4. The Bank has alleged that Wise, Davis and Del-Cid were employees of the Bank and performed services on behalf of Bank customers.

5. Defendants are Hilltop Securities, Inc. (a broker dealer) and individual employees of Hilltop Securities, Inc.

6. The parties desire to and/or are obligated to maintain the confidentiality of its confidential employee information and its confidential business information and trade secrets.

7. Therefore, the parties jointly agree to the entry of the proposed protective order bearing the electronic signatures of counsel for both parties, which is named Standard Protective Order – Northern District of Texas and is submitted contemporaneously hereto pursuant to the CM/ECF Administrative Guide and Policies and Procedures.

Proposed Order

1. The proposed confidential protective order template Standard Protective Order – Northern District of Texas was revised only to add the caption for this case and signature blocks for the attorneys and the Court. [Exhibit 1](#) (Standard Protective Order – Northern District of Texas (Redlined Order)).

See: <http://www.txnd.uscourts.gov/sites/default/files/documents/ProtectiveOrder.pdf> and

2. Defendant has submitted this same date a clean and signed copy of the Standard Protective Order to Godbey_orders@txnd.uscourts.gov. [Exhibit 2](#). (Standard Protective Order – Northern District of Texas – With Caption and Signature Blocks (Clean)).

Compliance with Rules, Local Rules, and Judge Godbey's Judge Specific Requirements

3. This Motion is in compliance with the instructions on the Protective Order page of the United States District Court of the Northern District of Texas websites and Judge Godbey's

Judge Specific Requirements for Protective Orders. See: <http://www.txnd.uscourts.gov/rules-and-orders> and <http://www.txnd.uscourts.gov/judge/district-judge-david-godbey>.

Conclusion

Wherefore, the parties respectfully request that this court enter the protective order submitted concurrently herewith pursuant to the CM/ECF Administrative Guide and Policies and Procedures.

Respectfully jointly submitted by,

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CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 29th day of January, 2019 that the undersigned electronically transmitted the forgoing document to the following:

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